

**UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

C.M., Michael Borrego Fernandez, J.M.C.,  
E.R., *on behalf of themselves and all others*  
*similarly situated, et al.,*

Plaintiffs,

v.

Case No 1:25-cv-23182-RAR

KRISTI NOEM, *Secretary of the United*  
*States Department of Homeland Security, et*  
*al.,*

Defendants.

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**STATE DEFENDANTS' NOTICE**

During the August 18th, 2025, hearing on Plaintiffs' Renewed Motion for Preliminary Injunction (ECF 29), this Court asked the State Defendants to clarify the status of the document attached to their Response to Plaintiffs' Renewed Motion for Preliminary Injunction (ECF 49) as Exhibit 10 to the Declaration of Mark Saunders (ECF 49-1), titled "South Detention Facility Visitation Policy" ("Visitation Policy").

The State Defendants notify the Court that the Visitation Policy is a draft policy governing detainees' access to their legal representatives. The State Defendants are, and have been, making their best reasonable efforts to implement its guidelines, but the document remains a draft because the State Defendants continue to adjust the Facility's policies to match the changing security and infrastructure conditions and needs at the Facility, and as required by Federal law. To that end, the State Defendants are able and willing to supplement the Record with the most up-to-date policies in place at the Facility, if needed.

Dated: August 18, 2025

Respectfully submitted,

/s/ Nicholas J.P. Meros

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's CM/ECF system, which provides notice to all parties, on August 18, 2025.

/s/ Nicholas J.P. Meros

*Counsel for the State Defendants*